

REMARKS

By this amendment, claims 3-4, 9-10, 15-17, 19, 22, and 25 have been amended. Claims 3-6, 9-12, 15-19, 22, and 25 are pending in the application. Applicant reserves the right to pursue the original claims and other claims in this and other applications.

Claims 3-4, 9-10, and 15-17 stand objected to as being in improper form and have been amended to address the concerns raised in the Office Action. Accordingly, the claims are now in condition for allowance.

Claims 3-6, 9-12, 15-19, 22, and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roy (US 6,496,859) in view of Shimizu (US 6,609,162), and further in view of Shiohara (US 6,822,754). This rejection is respectfully traversed.

In order to establish a *prima facie* case of obviousness “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” M.P.E.P. §2142. None of Roy, Shimizu, or Shiohara, even when considered in combination, teaches or suggests all limitations of independent claims 19, 22, or 25.

For example, claim 22, recites a machine-implemented method for selecting an appropriate device, the method comprising, *inter alia*, “integrating said plurality of profiles to create an integrated profile ...; creating a user interface for permitting a user to select a set of functions from the integrated profile; ... [and] creating an updated integrated profile of an updated virtual device having every function of the devices having the user selected functions” (emphasis added). Claims 19 and 25 recite similar limitations. Applicant respectfully submits that Roy does not teach or suggest these limitations.

To the contrary, Roy teaches that “a device location protocol (DLP) over UDP broadcast request is sent out that includes a list of devices, such as printers, that have

responded. The request is that only devices not on the list respond. Responses are then parsed and the responding device's network address is added to the list of responding devices." Col. 2, ln. 44-49. Roy FIG. 7 shows an alphabetical list, but Roy is otherwise silent with respect to any order of devices in the list. Applicant respectfully submits, however, that Roy does not disclose, teach, or suggest creating an updated integrated profile of an updated virtual device having every function of the devices having the user selected functions, as recited in claims 19, 22, and 25.

Nor does Shimizu disclose, teach, or suggest these limitations. Rather, Shimizu teaches "a virtual device realizable by combining devices on the network." Col. 13, ln. 58-60. No other priority order is disclosed, taught, or suggested by Shimizu. Applicant respectfully submits that Shimizu does not disclose, teach, or suggest creating an updated integrated profile of an updated virtual device having every function of the devices having the user selected functions, as recited in claims 19, 22, and 25. Thus, Shimizu does not remedy the deficiencies of Roy.

Moreover, Shiohara does not disclose, teach, or suggest these limitations. To the contrary, Shiohara teaches that a "print job management table 39 is provided for managing the address of the print data generation system 21, command system, the number of print pages, paper size, color information, and determination flag." There is no teaching of an ideal virtual device having every function of the devices. Applicant respectfully submits that Shiohara does not disclose, teach, or suggest creating an updated integrated profile of an updated virtual device having every function of the devices having the user selected functions, as recited in claims 19, 22, and 25. Therefore, Shiohara does not remedy the above-described deficiencies of Roy and Shimizu.

Since Roy, Shimizu, and Shiohara, even when combined, do not teach or suggest all of the limitations of claims 19, 22, and 25, claims 19, 22, and 25 are not obvious over the cited combination. Claims 3-6, 9-12, and 15-18 depend, respectively, from claims 19, 22, and 25, and are patentable at least for the reasons mentioned above and on their own merits. Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

In view of the above, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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